

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

DAVID BREWER, RYAN COMBS,  
VICTOR PEREZ, HAROLD  
BROWER, KYLE MANNION,  
GERALD O'HARA, NICHOLAS  
LEONARDI, DEAN KRINER, and  
JAMES WILLIAMS, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

No. 2:19-cv-12135-SJM-RSW

***EX PARTE* MOTION FOR LEAVE TO FILE EXHIBITS  
IN THE TRADITIONAL MANNER**

NOW COMES the undersigned counsel for Plaintiffs David Brewer, Ryan Combs, Victor Perez, Harold Brower, Kyle Mannion, Gerald O'Hara, Nicholas Leonardi, Dean Kriner, and James Williams pursuant to the Electronic Filing Policies and Procedures, seeks leave of this Court to file exhibits in the traditional manner.

Exhibits 5 and 6 to Plaintiffs' Class Action Complaint cannot be authentically converted to electronic form for the following reasons(s): all of the Exhibits are MP4 video files and cannot be converted to PDF as required in Rule R18(a) of the Electronic Filing Policies and Procedures for the Eastern District of Michigan.

For the foregoing reasons, the undersigned respectfully requests that this Court grant the leave sought in this motion.

Dated: July 22, 2019

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 22, 2019, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

A copy of the foregoing Motion and exhibits to be filed in the traditional manner were served by process server with a copy of Plaintiff's Class Action Complaint on Ford Motor Company through its agent for service of process, The Corporation Company, 40600 Ann Arbor Rd., E., Suite 201, Plymouth, MI 48170.

Dated: July 22, 2019

/s/ Steve W. Berman

Steve W. Berman